

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF MARIA E. CASTILLO

I, Maria E. Castillo, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. At the time of the terrorist attacks of September 11, 2001, I worked as a security guard with Summit Security Services, Inc., at the World Trade Center (WTC) property. I had been employed with Summit Security Services since June of 1999. Attached as Exhibit B to this Declaration is a true and correct copy of my proof of employment and my presence at the WTC at the time of the 9/11 terrorist attacks.

4. On the morning of September 11th, I had been providing security services near 4 World Trade Center (WTC) when the first passenger jet, American Airlines Flight 11, struck the upper section

of the North Tower. I felt the building tremble and a voice announced on my secure radio that an airplane had crashed into the North Tower.

5. I ran upstairs to inspect the area and I saw building debris on the concrete floor and large amounts of debris falling out of the sky. The scene was horrific. I immediately began to direct the fleeing crowd of people in a safe direction away from the debris area. However, the mass of people escaping the area ignored my instructions, and they knocked me down and trampled over me. As the crowd trampled over me, I severely injured my back, neck, and right knee.

6. As I laid on the floor, I screamed for help due to my fear and the pain emanating from my back. One of my coworkers, Samuel, came to my aid and he helped me to stand up. After the crowd of people had left the area, I then left the area near 4 WTC as well.

7. Despite my injuries, I made my way outside of the building again. I could see smoke and flames shooting out of the North Tower. I made my way towards the South Tower to get my bag. As I reached the revolving doors of the entrance to the South Tower lobby, a crowd had gathered inside of the building. I stopped and helped to evacuate hundreds of people through the revolving doors of the South Tower.

8. I ran toward 5 WTC in an effort to help others evacuate the area. I saw dead bodies and many people that had been burned or severely injured. The scene looked like a war zone.

9. The second passenger jet, United Airlines Flight 175, then struck the upper section of the South Tower as I assisted my supervisor in evacuating more people. In the panic that ensued, I could not readily determine the best route to escape from the area. I began to run away from the area, but the South Tower then collapsed. The massive cloud of smoke, chemicals, and building debris consumed me, and I was unable to see anything around me.

10. In the darkness of the debris cloud, I fell to the ground a second time. People trampled over me as they fled the area, and I suffered additional injuries to my back. I crawled my way through the smoke and debris until I saw daylight, and I made my way to New York's City Hall. Due to my multiple injuries, I sought initial treatment at Parkway Hospital shortly after the events of 9/11.

11. As a result of these terrorist attacks, I suffered the following injuries¹ on September 11, 2001: injuries to my back (including a herniated disc and bulging discs)², my neck³, and my right knee⁴. Further, due to the horrific events that I experienced on 9/11, my doctors diagnosed me with depression and post-traumatic stress disorder⁵.

13. I sought and continue to seek medical attention for my physical and emotional injuries caused by these terrorist attacks. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant records confirming my physical and emotional injuries following the September 11, 2001, terrorist attacks.

14. I previously pursued a claim (VCF Number 212-000725) through the September 11th Victim Compensation Fund (VCF) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

¹ See, 9/11 Injury Records of Maria E. Castillo (CASTILLO_MEDS_0001), attached hereto as Exhibit B, at 0001-0038.


² *Id.* at 0001-0002, 0004-0019, 0021, 0023, 0025-0027, 0031, 0033, and 0035-0038.

³ *Id.* at 0002, 0004, 0006, 0008-0009, 0011, 0016, 0028, and 0035.

⁴ *Id.* at 0001-0002, 0004, 0027, and 0029.

⁵ *Id.* at 0006-0008, 0010, 0013-0014, 0020-0021, 0023, 0025, and 0027.

DATED this 23 day of October 2023.


Declarant Maria E. Castillo

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**